



October 3, 2017

**By ECF**

The Honorable John G. Koeltl  
United States District Court for the  
Southern District of New York  
500 Pearl Street  
New York, New York 10007-1312

Re: *United States v. Narco Freedom, Inc., et al.*, 12 Civ. 3674 (JGK)

Dear Judge Koeltl:

We represent Defendant Alan Brand in the above-referenced action. We are in receipt of Your Honor's Order extending Defendants' time to answer the Complaint-In-Intervention to October 13, 2017 (Dkt. No. 126). We request that our time to answer be extended thirty (30) days to November 13, 2017.

We have been advised by Your Honor's Deputy Clerk that Defendant's application for a pre-motion conference on a motion to dismiss (Dkt. No. 128) will be decided at the scheduled October 20, 2017 conference. Accordingly, we respectfully request that our time to answer be extended to after the conference.

We thank the Court for its consideration of this request.

Respectfully submitted,

O'CONNELL AND ARONOWITZ

By: /s/ **Mary T. Connolly**

Mary T. Connolly

cc: Counsel of Record (by ECF)

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SAMUEL E. ARONOWITZ  
1925-1973  
LEWIS A. ARONOWITZ  
1951-1979

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